1 SUE P. FAHAMI Acting United States Attorney 2 District of Nevada Nevada Bar No. 5634 3 VIRGINIA T. TOMOVA Assistant United States Attorney Nevada Bar No. 12504 501 Las Vegas Blvd. So., Suite 1100 5 Las Vegas, Nevada 89101 (702) 388-6533 Virginia.Tomova@usdoj.gov 6 7 Attorneys for the Federal Defendant 8 UNITED STATES DISTRICT COURT DISTRICT OF NEVADA 9 Antoine El Habre, Case No. 2:25-cv-00142-CDS-EJY 10 Stipulation and Order to Extend Time Plaintiffs. 11 to Answer v. 12 (First Request) Marco Rubio, 13 Defendant. 14 Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of 15 this Court's Local Rules, Plaintiff Antoine El Habre, and Federal Defendant Marco Rubio, 16 through undersigned counsel, hereby stipulate and agree as follows: 17 Plaintiff filed his Complaint for Declaratory and Injunctive Relief on January 23, 18 2025. ECF No. 1. 19 Plaintiff served Federal Defendant with a copy of the Summons and Complaint via 20 U.S. priority mail on January 30, 2025. 21 The current deadline for Federal Defendant to respond to Plaintiff's Complaint is 22 March 31, 2025. 23 On March 28, 2025, undersigned counsel for Plaintiff and Federal Defendant agreed 24 to a 30-day extension of time for Federal Defendant to review the record and continue 25 gathering information from agency counsel. The standard for extending time is good cause. 26 See FRCP 6(b)(1)(A). 27 28

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1 Accordingly, the parties, through undersigned counsel, submit this stipulation to a 2 30-day extension from March 31, 2025, to April 30, 2025, for Federal Defendant to file an 3 answer or otherwise respond to the Complaint. This is Federal Defendant's first request for 4 an extension of time. 5 This stipulated request is filed in good faith and not for the purposes of undue delay. 6 Respectfully submitted this 31st day of March 2025. 7 PETER L. ASHMAN SUE P. FAHAMI Nevada Bar No. 2285 Acting United States Attorney 8 Law Offices of Peter L. Ashman 501 S. Rancho Drive, Ste. A-8 /s/ Virginia T. Tomova 9 Las Vegas, Nevada 89106 VIRGINIA T. TOMOVA pla@ashmanlaw.com Assistant United States Attorney 10 <u>/s/ Jesse M. Bless</u> JESSE M. BLESS Attorneys for the Federal Defendant 11 Bless Litigation LLC 12 6 Vinevard Lane Georgetown, MA 01833 13 jess@blesslitigation.com 14 Attorneys for the Plaintiff 15 IT IS SO ORDERED: 16 17 18 19 20 March 31, 2025 **DATED:** 21 22 23 24 25 26 27 28